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*Attorneys for Defendants*  
*New York Hotel and Motel Trades Council, AFL-CIO*  
*and Peter Ward*

Barry N. Saltzman (BS 6533)  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRAN DINH TRUONG, individually and of :  
Behalf of ALPHONSE HOTEL CORP. d/b/a :  
HOTEL CARTER, :  
:

Plaintiff, :  
:

-against- :  
:

NEW YORK HOTEL & MOTEL :  
TRADES COUNCIL, AFL-CIO, and :  
THE OFFICE OF THE IMPARTIAL :  
CHAIRMAN and PETER WARD, :  
:

Defendants. :  
:

Case No. 1:07-Civ-11383 (RJH)

**NOTICE OF MOTION**

-----X  
PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Barry N. Saltzman, dated April 8, 2008, and the exhibits annexed thereto, the accompanying memorandum of law dated April 8, 2008, and all prior proceedings had heretofore herein, defendants, New York Hotel and Motel Trades Council, AFL-CIO and Peter Ward (collectively the "Union Defendants"), will move before the Honorable Richard J. Holwell, U.S.D.J., at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for sanctions against motion for sanctions against plaintiffs Tran Dinh Truong and Alphonse Hotel Corp. d/b/a Hotel Carter ("Plaintiffs") and Calabro & Associates, P.C. ("Calabro") pursuant to

Rule 11 of the Federal Rules of Civil Procedure ("FRCP") and 28 U.S.C. § 1927, and granting such further relief as the Court may deem just and proper.

Dated: New York New York  
April 8, 2008

Respectfully submitted,

PITTA & DREIER, LLP

By: 

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